

January 30, 2012

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

**NOTICE OF EX PARTE COMMUNICATION
(Docket is WC 11-42)**

Dear Ms. Dortch:

On the morning of Tuesday, January 23, 2012, in three separate meetings, Carolyn Quick Tillery from the Department of Veteran Affairs (VA), Homeless Veterans Initiative Office (HVIO) met with FCC Representatives. During two separate morning appointments, she met with Angie Kronenberg and Christine Kurth. Later that afternoon, she met with: Zachary Katz, Chief of Staff; Sharon Gillett, Chief Wireline Competition Bureau; Kimberly A. Scardino, Deputy Division Chief, Telecommunications Access Policy Division (TAPD), Christine Kurth, Policy Director and Wireline Counsel (Office of Commissioner Robert M. McDowell), Michael Steffan, the Wireline Advisor, Jamie Susskind, Attorney Advisor, TAPD; Robert "Beau" Finley Attorney Advisor, TAPD and Nicholas Alexander, Attorney Advisor, TAPD.

These meetings were requested by VA HVIO to restate concerns expressed in our prior meeting as a described in our August 22, 2011, Notice of Ex Parte Communication and emphasize the critical importance of telephone communications to the issue of Veteran homelessness. During the course of this meeting VA renewed a previous request for (1) automatic eligibility of homeless Veterans and (2) an exception to the 1 telephone per residential address.

In addition, VA suggested that such an exception was not inconsistent with the FCC statutory goal of ensuring that universal support is sufficient but not excessively costly, because:

- Consumers are not members of the same household; therefore, no risk of service abuse by costly duplication of service to a family/household exists.
- Veterans are multiply housed but unrelated much like apartment or condo dwellers and use of an additional unique identifier such as their telephone

number prevents duplicate services in the absence of some other unit identifier.

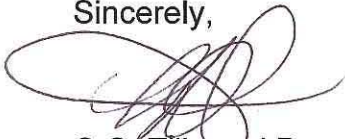
However, as applied to Veterans multiply housed in shelters and transitional housing, the present rule is inconsistent with the program's overarching intent of ensuring affordable telephone service to low-income consumers due to:

- Acting as a communication barrier to those whose financial circumstances have deteriorated to the point of sheltering with other unrelated but similarly situated persons requiring Lifeline telephone services.
- Inconsistency with program intent to target support where most needed and maximize the number of Americans with telephone network access.

Finally we discussed identifying homeless Veterans within the category of those considered automatically eligible for Lifeline telephone services.

During all three meetings FCC disclosed that the new rule under consideration would redefine household as, "one economic unit, consisting of those sharing income and expenses." Under this redefinition, multiple households could share one dwelling or unit and still meet the eligibility requirements for receiving Lifeline telephone services by certifying as a separate household. One means of eligibility certification is with proof of income or absence thereof. As a result, the question arose as to whether there is a data base of homeless Veterans that could be accessed by the agencies to certify eligibility or alternatively are eligible Veterans provided any official documentation of program enrollment that could be used for certification purposes.

Sincerely,



C.Q. Tillery, J.D.
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